

REMARKS

This Amendment is submitted in response to the Office Action dated January 7, 2004, having a shortened statutory period set to expire April 7, 2004. Claims 1-5 are pending. Applicants have amended Claim 1 and canceled Claim 4.

CLAIM REJECTIONS – 35 U.S.C. § 103(a)

On page 2 of the present Office Action, Claims 1-5 have been rejected under 35 U.S.C. §103(a) as being unpatentable over admitted prior art (Figs. 1, 2 and page 3) in view of *McNeil, et al.* (U.S. Patent No. 4,877,479). That rejection is respectfully traversed and reconsideration of the claims is requested.

Independent Claim 1 in the present application includes an element (d) reciting “blocking at least some of the holes in the grid.” It is argued on page 3 of the present Office Action that *McNeil, et al.* disclose a mechanism for selectively processing a portion of a substrate, with particular reference to Figure 3 and col. 3, lines 8-39. However, *McNeill, et al.* shows in Figure 2 a rotating mask that is not a grid. The rotating mask shown in Figure 2 is a solid plate that directly blocks the ion beam. The mask does not block “at least some of the holes in the grid,” nor is there any suggestion that the mask can be used in conjunction with a grid to block “at least some of the holes in the grid.” Therefore, *McNeil* does not disclose the present invention in Figure 2.

Applicants further submit that it is not obvious to arrive at the method of exemplary Claim 1 in the present application from the teaching of *McNeil*. Nothing within the disclosure of *McNeil* suggests that the prior art rotating mask of Figure 2 could be used in conjunction with a grid as shown in Figure 1 to block holes within the grid. Moreover, in addition to not suggesting the use of both types of masks together to etch or deposit on the same target, *McNeil* actually teaches away from such a combination as using a flat stencil such as that shown in Figure 2 in the same application as a grid. As explained at col. 3, lines 8-31 a mask containing a grid such as that shown in Figure 1 of *McNeil* is typically used for non-symmetrical surfaces, and a rotating mask having a solid surface such as that shown in Figure 2 is suited primarily for

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rotationally symmetric surfaces. As can be seen that someone skilled in the art would learn to use the grid and solid mask separately, independently and for separate applications based on the teaching of *McNeil*. Consequently, Applicants respectfully submit that *McNeil* cannot show or suggest the present invention as claimed, and that the rejection of Claims 1-5 under §103(a) as being unpatentable over admitted prior art in view of *McNeil* should be withdrawn.


On page 3 of the present Office Action, Claims 1-5 have been rejected under 35 U.S.C. §103(a) as being unpatentable over admitted prior art (Figs. 1, 2 and page 3) in view of *Watanabe* (JP 2000-11905-A). That rejection is respectfully traversed and reconsideration of the claims is requested.

Claim 1 of the present application includes a step (d) of "covering a radial swath of the grid from a center of the grid to a perimeter of the grid." It is argued on page 4 of the present Office Action that *Watanabe* discloses this element by the ion plate 23 blocking a portion of the ion beam directed at grids 21, 22. However, the disclosure of *Watanabe*, for example as shown in Figure 1, discloses a plate 23 having a donut-shaped hole. The center of the ion beam generated from ion gun 14 is unobstructed or blocked by plate 23. As can be seen, *Watanabe* is not showing or suggesting "covering a radial swath of the grid from a center of the grid to a perimeter of the grid," as is recited in independent claim 1 because nothing covers the center of the grid. Applicants respectfully submit that *Watanabe* does not show or suggest the present invention as claimed and the rejection of Claims 1-5 as being unpatentable over admitted prior art in view of *Watanabe* should be withdrawn.

CONCLUSION

Applicants have argued that *McNeil* does not show or suggest "blocking at least some of the holes in the grid" as recited in Claim 1, and therefore the rejection under §103 should be withdrawn. Further, Applicants have argued that *Watanabe* does not show or suggest "covering a radial swath of the grid from a center of the grid to a perimeter of the grid" and therefore the rejection of the claims under §103 as being unpatentable over admitted prior art in view of *Watanabe* should also be withdrawn. Believing that all rejections in the present Office Action have now been overcome, Applicants respectfully suggest that a Notice of Allowance be issued.

Respectfully submitted,



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